

Connecticut General Assembly  
Environment Committee  
March 4, 2016

SB-231 An Act Concerning Pollinator Health

My name is John Chunis. I live at 40 Deerfield Run, Rocky Hill, CT. I am a licensed Arborist in the State of Connecticut, License # S-6093.

While I am unable to attend the Public Hearing, I would like my opinion on this bill to be considered.

There have been numerous studies on pollinator health recently published in the open literature. Some are based on scientific research and others based on a “pulp fiction” culture on social media. Several excellent publications have been authored by Dr. Richard Cowles of the Connecticut Agricultural Experiment Station, many of which are available on the CAES website (<http://www.ct.gov/caes/site/default.asp>) and I would encourage Committee members to utilize this excellent resource when debating this Bill.

In general, neonicotinoid insecticides pose little risk to pollinators when used by knowledgeable applicators in accordance with the label. However, there are all too many cases when non-licensed individuals, whether they are the homeowner or non-professional applicator, use insecticide products inappropriately and / or just don't care about the consequences. Some have made national headlines, such as the 2013 honey bee kill in an Oregon shopping mall parking lot, due to an illegal neonicotinoid application on Linden trees. I had a client last year who had several Arborvitae trees in decline and asked for my assessment. He informed me that he applied two different fungicide applications and two different pesticide applications, with products that were purchased at a local big box store, with no improvement to the trees. On inspection of the site, it was obvious that the problem was not a disease nor an insect. The trees were ball and burlap, planted only half way in the ground, with the burlap and nylon rope still wrapped around the root ball. Essentially, the trees suffered significant summer drought stress and winter desiccation. His fungicide and pesticide applications were a waste of money and an unwarranted exposure to the environment.

Due to the ongoing debate on bee health and the potential risk to pollinators by inappropriate neonicotinoid use, classification of all neonicotinoids as Restricted Use Pesticides is warranted. This would still allow the products to be available for use by

licensed professionals, who understand the risks and need for following label requirements.

With regards to Sec. 4 (NEW), (b), the terms “agricultural use” and “horticultural use” should be defined, to avoid confusion and / or objections during implementation.

With regards to task force assessment activities defined in Sec.5 (a), subsection (1) should be stricken, and replaced with the requirement to assess the US EPA Imidacloprid Pollinator Risk Assessment scheduled for release in December of 2016, and application of these results in Connecticut. We should not go beyond the requirements of our national agencies, especially with requirements of other countries. That is why we have our US EPA and we should stand by the requirements issued by that agency, otherwise we risk non-productive legal challenges.

With regards to task force assessment activities defined in Sec.5 (a), subsection (7) should be stricken. Prohibiting the appropriate use of neonicotinoids by licensed professional applicators will have little effect on improving pollinator health while drastically impacting both agricultural and horticultural benefits. Any such prohibition should be promulgated only by the US EPA.

With regards to the task force membership of Sec. 5, (b), some consideration should be made to include at least two members from the insecticide industry and at least two members from licensed applicators, such as the Connecticut Tree Protective Association, since they have a vast amount of knowledge and any forth coming regulations will ultimately affect them.

Thank you for considering my opinions.